

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	Chapter 11
JOHN WEI (f/k/a WEI XIANG YONG),	Case No: 23-13678
Debtor.	

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICES**

PLEASE TAKE NOTICE, that the undersigned counsel hereby enters their appearance for Wells Fargo Bank, National Association, as Trustee, for the benefit of the registered holders of Benchmark 2021-B29 Mortgage Trust Commercial Mortgage Pass-Through Certificates, Series 2021-B29, and the RR interest owners (hereinafter, the “Creditor”), pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*, Rules 2002, 3017, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure and requests that copies of all pleadings, motions, notices and other papers filed or served in this bankruptcy case, be served upon the Creditor through their undersigned counsel, as follows:

Matthew G. Summers, Esq.  
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Raymond A. Quaglia, Esq.  
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PLEASE TAKE FURTHER NOTICE, that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal,

and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Appearance and Request for Notices* nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed or construed to constitute a waiver of any substantive or procedural right of the Creditor including, without limitation, (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the Eastern District of Pennsylvania (the “District Court”), (ii) the right to trial by jury in any proceeding related to this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court, or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Creditor is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until Creditor expressly states otherwise, Creditor does not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

*[Signature page follows]*

Dated: March 14, 2025  
Wilmington, Delaware

/s/ Raymond A. Quaglia  
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-and-

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*Counsel for Wells Fargo Bank, National Association,  
as Trustee, for the benefit of the registered holders of  
Benchmark 2021-B29 Mortgage Trust Commercial  
Mortgage Pass-Through Certificates, Series 2021-  
B29, and the RR interest owners*

**CERTIFICATE OF SERVICE**

I, Raymond A. Quaglia, hereby certify that, on this 14th day of March, 2025, I caused a true and correct copy of the foregoing *Notice of Appearance and Request for Notices* to be served upon all parties who have requested notice in this case via the Court's CM/ECF system.

Dated: March 14, 2025  
Philadelphia, Pennsylvania

/s/ Raymond A. Quaglia  
Raymond A. Quaglia, Esq.  
BALLARD SPAHR LLP